

**SANILAC COUNTY COMMUNITY MENTAL HEALTH AUTHORITY**

ADMINISTRATIVE POLICY

**NUMBER: BA065**

**NAME: COMMUNICATION – INTERPRETERS AND TRANSLATORS**

INITIAL APPROVAL DATE:	12/02/2020	BY: Administrative Committee
STAKEHOLDER REVIEW:	09/06/2023	BY: Consumer Advisory Board
(LAST) REVISION DATE:	06/26/2023	BY: Administrative Committee
(LAST) REVIEW DATE:	10/17/2024	BY: Policy Committee
DISCONTINUED DATE:		REPLACE BY:

**I. PURPOSE**

To outline and ensure the availability and functionality of interpreting resources intended to assist in the delivery of Sanilac CMH services to those served who have limited English proficiency and desire to use interpreters and translators when appropriate.

**II. APPLICATION**

Populations: **ALL**  
Programs: **Direct - ALL**  
**Contracted - ALL**

**III. DEFINITIONS**

- A. VRI – Virtual Remote Interpreting Services is an internet-based service utilizing video equipment and microphones.
- B. Limited English Proficiency (LEP)– applies to any person whose primary language is not the spoken English language. This includes, but is not limited to, those individuals whose primary means of communication is sign language.
- C. Provider/Coordinators: Any Sanilac CMH employee or representative of a contracted provider who is responsible for the scheduling of a service. This includes but is not limited to Nurses, Therapist, Care Managers, Service Coordinators, Assistants, and Clerical staff.

**IV. STANDARDS**

Sanilac County Community Mental Health Authority (Sanilac CMH) shall utilize interpreters/translators, when appropriate, to facilitate communication with non-English or limited-English proficient individuals in order to maximize the benefit of health care and exchange of information between employees and individuals/families who are receiving services. Sanilac CMH may use individuals and contract agencies to provide interpretation services. This may include interpreters/translators via telephone or in person. Sanilac CMH has a list of local individuals and agencies that may be used for interpretation at the reception desk.

Family members or friends of the non-English or limited-English proficient individual may be utilized for information gathering during an emergency only. Family members should not be used as interpreters on a regular basis. Interpreters/translators shall be utilized during treatment as needed to assess and ensure accurate communications. The appropriate authorization form shall be maintained on file. The Agency’s Services Guide and the Recipient Rights booklets will be kept on hand in Spanish.

- A. LEP services will be available for all respective demographic groups based on annual planning and community needs assessment.

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- B. Interpretation/translation services will be provided that are appropriate and timely for the size and needs of our Agency.
- C. All auxiliary aids and services will be readily available and responsive to the needs of our individuals with disabilities.
- D. Individuals are made aware of the availability of interpreter services at the time of intake and annually thereafter.
- E. All interpreters, employees, and affiliated providers must understand and adhere to confidentiality and privacy requirements applicable to the service provider, including but not limited to the requirements of HIPAA, 42CFR Part 2, patient privacy requirements specific to care for minors, and all other applicable state and federal laws.
- F. Consent from the individual needs to be regularly sought, explained, documented, and updated to allow the Agency staff to communicate with other health care providers, family and friends as appropriate.

### **V. PROCEDURE**

As requested, and outlined in the IPOS document, those individuals with Limited English Proficiency who request interpreting services will be accommodated through the use of one of two possible resources: VRI (Virtual Remote Interpreting) or in person interpreting services (interpreter brought to facility). The process for ensuring these services are available and functioning at the time of a scheduled Sanilac CMH service is as follows:

- 1. Once the need for interpreting services is identified, the primary caseholder will notify the Clinic Services Program Secretary and all Sanilac CMH direct and contracted service providers/coordinators of the need. The Multi-Consent form must be obtained for VRI services; and an Authorization for Release of Information obtained for face-to-face interpreting services.
- 2. Providers/coordinators will then forward information regarding scheduled service dates, times, and locations to the Clinic Services Program Secretary who will then coordinate with contracted interpreting services for the scheduling and delivery of interpreting services.
- 3. The process for scheduling VRI and face to face services will be as follows:
  - a. Onsite Interpreter – Generally utilized for community, classroom, and appointments longer than 30 minutes shall be scheduled in advance by written request and confirmed in writing.
  - b. VRI – Prior to the scheduled appointment time, the clerical staff will log onto the VRI web site to ensure its functionality and readiness for the appointment.
- 4. Following a completed interpreting service(s), invoices will be sent to the clerical staff for verification prior to being forwarded to the Chief Financial Officer.

### **VI. ATTACHMENTS**

None

### **VII. REFERENCES**

None